operations, and/or its advanced services affiliates. SBC personnel have acknowledged that SBC's internal DSL operations utilize pre-ordering and ordering systems different than those used by CLECs. For example, SBC's makes available an interface, ASOS, that is not available to CLECs. Additionally, SBC makes available CPSOS to both its affiliate and unaffiliated CLECs for pre-qualification, but SBC provides CPSOS for ordering and order status to its affiliate only.[16] Further, SBC agreed during the collaborative Such arrangement creates an unacceptable disparity because CPSOS appears to have the capability to function as an integrated, mechanized system handling all functions from pre-ordering through ordering.

CLECs requested that the POR establish a process for providing information on systems used by SBC's internal operations and/or advanced services affiliate, and information regarding performance measures for internal versus CLEC systems.

G. Spectrum Management

CLECs have requested, and the Texas PUC and FCC have ordered SBC to dismantle its binder group management/selective feeder separation ("BGM/SFS") system. Therefore, CLECs requested documentation that the table changes, rules and other changes made in LFACS, FACS, TIRKS, or any other system or database have been removed so that the SFS/BGM system cannot be used in loop assignments. Despite repeated requests, SBC brought no such documentation with it to the March 28 meeting. However, SBC personnel indicated that documentation existed. Specifically, documentation was provided to each service region's systems administrator detailing the exact changes to be made to remove the SFS/BGM system. Therefore, the Participating

[16] SBC indicated that CLECs could obtain information regarding CPSOS on the SBC secure website, but no such information was located.

CLECs reiterate this request documentation from SBC's internal change management process, including the change management request number and details of the request(s) directing the dismantling the BGM/SFS system.

Request for documentation regarding the dismantling of SBC's BGM/SFS system is appropriate for several reasons. First, the D1/D2 designators placed on loops in conjunction with BGM/SFS provide loop length categories (i.e., D1 designates loops of 12,000 feet or less and D2 designates loops of more than 12,000 feet). Such information, which is contained in LFACS, but not available to CLECs, could be used by SBC as an initial loop screening method for short loops. Orders for short loops can be flowed through without loop qualification. In addition, the Merger Conditions are intended to ensure CLECs can compete effectively. Therefore, the Plan of Record should be used both to ensure SBC provides necessary functionality as well as to ensure that SBC cannot introduce elements into its OSS that would disadvantage CLECs. For example, SBC once asserted that CLECs must specify on the LSR different loop types for different xDSL types. Such system would be cumbersome and unnecessary, but worse, could allow SBC to delay CLEC xDSL services by requiring ordering of multiple loop types.

H. Line Sharing

SBC must be required to address fully in its POR all OSS issues related to ordering in a line-sharing environment. If CLECs cannot successfully place an order, they will clearly be precluded from fully exercising their rights to line share under the Commission's order. SBC provided only a high-level discussion that ordering for line sharing will be handled in the same manner as non-lined shared xDSL. However, these statements contradict information provided to CLECs in SBC's Line Sharing

proceedings. It should be noted that Pacific Bell has stated in testimony in a proceeding to implement line sharing in California that it will rely on the POR process for the development of OSS for line sharing.[17]

I. UNE-P:

The Participating CLECs requested OSS information regarding addition of xDSL service to a UNE-P configuration. Because it is necessary to work out the actual processes and procedures to allow such activity, including pre-ordering, ordering, maintenance and repair, it is an appropriate issue for the POR proceeding. Participating CLEC attempts to date to negotiate such processes and procedures with SWBT have been unsuccessful, despite SBC's commitment to do so in its filing with the FCC dated February 22, 2000 titled *"Reply Brief In Support of Applications By Southwestern Bell For Provision of In-Region InterLATA Services."* On page 37, footnote 19 SBC stated that "AT&T is free to offer both voice and data service over the UNE Platform or other UNE arrangements, whether by itself or in conjunction with its xDSL partner, IC Communications. The Commission's Line Sharing Order did nothing to alter those options; it merely allowed data CLECs to access the high-frequency portion of loops over which the incumbent already provides voice service." While Participating CLECs have repeatedly requested clarification through the POR process regarding whether SBC intends to comply with the statement in its Reply Brief, the issue remains open.

VI. OTHER ISSUES

The Participating CLECs and SBC were unable to reach resolution on numerous issues primarily because SBC did not have information or did not have requested

[17] Testimony of V. Alan Samson, March 27, 2000, R.93-04-003/I.93-04-002 (Line Sharing Phase) at 23 (excerpt provided as Attachment B).

documentation. However, during a lengthy conference call on March 31, 2000, the date this CLEC document was due, SBC reached agreement with the Participating CLECs on many of these issues.[18] Where agreement was reached, language is provided in Attachment A.

[18] These issues are identified in a separate section because although the Participating CLECs believe resolution was reached, further confirmation of SBC's fulfillment of these matters may be needed.

A. Issues Requiring SBC Agreement

1) Elimination of Mandatory Tracking Number: SBC agreed to make available the CNO field for use with an optional tracking number generated by the CLEC. The field will have no edits and therefore the absence of a number in the field should not affect the timely flow-through processing of a CLEC order.

2) Continued Support for Pre-Qualification: SBC had agreed that it will continue to make available a pre-qualification process through Datagate and EDI in any service area where it is currently available.

3) Keeping Verigate and LEX in synch with Datagate and EDI: SBC agreed to this item.

4) Date returned by all systems for loop qualification: SBC admitted to add a date field on all systems (EDI/CORBA and Datagate) for manual loop qualifications, but not for mechanized.

5) Definition of loop length in a project pronto configuration: SBC agreed to provide the entire length of the loop from the CO to the customer premises, which includes the fiber portion of the loop between the CO and the RT and the copper portion between the RT and the customer premises.

6) Conditioning of Loops: The Participating CLECs asked SBC to make the same commitment as Bell Atlantic and provide free conditioning on loops up to 18,000 feet. SBC has agreed only to condition loops up to 12,000 feet without charge. SBC refused, but the CLECs agreed this should be retained as an item for future discussion.

B. Issues Closed After SBC Provided Requested Information

SBC provided sufficient information that the Participating CLECs were able to reach agreement and/or close the following items. However, the Participating CLECs reserve the right to seek additional clarification in the future, if necessary.

1) Valid value null indicator will be developed.

2) Ameritech email Loop Qualification is considered to be manual.

3) Parity matrix was distributed.

4) Flow-thru matrix updated: SBC agreed to provide an corrected copy of a matrix discussing flow-through issues. However, SBC has not yet provided such matrix.

5) Verification that the two fields (wire center code and design cable gauge makeup) in SBC's mini database for pre-qualification will be unmasked for Pacific as well as for SWBT territories.

6) SBC will verify accuracy and availability of the fields in the LoopQual data matrix.

7) Sample data: SBC will should provide sample data for all 1300 addresses requested by CLECs, not just 50 addresses, as provided at the March 28 and 29 meeting.

8) RTZ: SBC confirmed that prequalification systems returning red,yellow,green or RTZ indicators are available in Pacific's region and will be available into the future.

9) Ordering Problems with 3/18 Release of EDI/DataGate: SBC acknowledged a problem with the new release that returned incorrect information regarding presence of DLC. Therefore, CLECs may be getting false loop qualifications indicating a loop is not suitable for xDSL. SBC issued an Accessible Letter stating that a problem had occurred, as well as the duration of the problem. However, SBC did not provide details regarding

the cause or the fix for the problem. SBC agreed to recheck all reject indications issued between 3/18 and the date of repair to determine which CLEC orders may have gotten false rejection notices.

10) SBC agreed to provide a spec code requested by SBC's data affiliate that will allow it to request to preauthorize any necessary conditioning

11) SBC added language to the POR that it would provide electronic availability of spare pairs.

VII. CONCLUSION

The Participating CLECs have made progress in addressing OSS issues for pre-ordering and ordering xDSL loops in workshops with SBC. However, a number of resolved issues remain as identified in Section V and arbitration may be necessary for resolution of these issues.

Dated April 3, 2000

Respectfully submitted

On Behalf of CLECs

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ATTACHMENT A
(Changes to which agreement was reached)

This attachment sets forth language for issues on which agreement was reached between CLECs and SBC. Because the CLECs did not agree that SBC's POR was complete, they are not willing to sign the POR itself. However, this attachment should be included as an addendum to SBC's enhanced POR distributed on December 2, 1999. For ease of reference, the CLECs have included section headings from SBC's POR.[1]

I. INTRODUCTION

C. Process Methodology

[Insert as the second and third paragraphs]

Currently, each SBC service area has its own Change Management Process (CMP). These processes were developed collaboratively with the CLECs (with the exception of the Ameitech CMP) well before the SBC/Ameritech merger, and have each been in place since at least June 1999. CMP provides a means by which each regional company and the CLECs can work cooperatively to introduce changes to the OSS interfaces. These processes include specific intervals, such as when release specifications will be delivered to the CLECs for review and input. However, due to the short timeframes associated with this Plan of Record the exception process has been and will continue to be utilized to implement the enhancements specified in the Plan of Record. The release dates for all enhancements associated with this Plan of Record have been included in the timeline found in the FMO section of this document.

A 13-state CMP is currently being addressed in a separate CLEC collaborative effort that began in November 1999 following the SBC/Ameritech merger close. The 13-state CMP is expected to be approved by SBC and the CLECs in June 2000. Once implemented, as described in the CMP transition plan, SBC will replace the various CMP processes currently in use with this new CMP. SBC is committed to using the CMP to deliver the changes identified in this POR.

II. PRESENT METHODS OF OPERATION (PMO)

[No agreed-to changes]

III. FUTURE METHOD OF OPERATION (FMO) for SBC (All Regions)

A. Overview

[insert at the end of the first paragraph]
SBC provides access to the same pre-order data via its Verigate, EDI Pre-Order and DataGate interfaces. Verigate and EDI Pre-Order functions use DataGate to access backend systems.

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[1] Additionally, nothing in this attachment should preclude the CLECs from asserting any unresolved issues in the next series of collaboratives on SBC's proposed 13-state uniform OSS POR.

SBC's EDI Ordering and LEX interfaces both access LASR to process the same types of Local Service Requests using the same business rules structure. SBC is committed to maintain Verigate and Pre-Order EDI in sync with DataGate and LEX in sync with the EDI Ordering interface. Further, once deployed as discussed in Section C, SBC will maintain the Ameritech TCNet GUI for Loop Qualification, in sync with Ameritech's EDI Pre-Order interface.

B. Loop Pre-Qualification

[insert at the end of the first paragraph]
This function in SWBT region has been enhanced as of March 18, 2000 to provide two additional fields of data, the Wire Center Code and Design Cable Gauge Make-up. These same two fields will be provided in PB/NB by July 22, 2000. Additionally, the pre-order loop pre-qualification function has been made available in the SNET region as of March 27, 2000. It will also be made available in the Ameritech region at such time as the loop pre-qualification functionality is available to any company in that region, including but not limited to Ameritech or AADS or March 2001, whichever is earlier. There will be no charge for Loop Pre-Qualification. The performance of the Pre-Qualification step by the CLEC is optional.

**[please note there is a disputed item with regard to whether CLECs should be charged for loop qualification even if the CLEC deems pre-qualification to be sufficient to order the loop] (ASI does not concur with this statement)

C. Loop Qualification

[insert after the second paragraph]

- Loop length: includes both the feeder pair (F1) and the distribution pair to the customer's terminal (e.g., Pedestal) (F2). By July 22, 2000, for "Project Pronto" Broadband UNE Loops, the loop length will be returned indicating the length of the portion that is copper and the length of the fiber from the Central Office to the RT. The overall loop length for all loops will display the portion that is copper and the portion that is fiber, either in this field or in separate fields, no later than May 17, 2000.
- Loop length by segment
- Length by gauge
- 26 gauge equivalent loop length (calculated)
- Presence of load coils
- Quantity of load coils (if applicable)
- Presence of bridged taps
- Length of bridged taps (if applicable)
- Presence of pair gain/DLC
- Qualification status of the loop based on specified PSD. If no PSD class is specified, the default PSD is class 5 (ADSL).

- Source of data – actual or designed

A data source indicator will identify if the response contains information about an actual loop or information regarding the longest designed loop within the distribution area. Designed loop information will only be provided when actual loop make-up information is not mechanically available for the specific requested address.

The following information will be returned, when available, in response to a Loop Qualification request. Due to the differences in OSS used in the different SBC regions, and past engineering practices followed when installing and managing loop plant, the amount of loop make-up information available in SBC's OSS will vary. Where such information is not available, the CLECs desire that an indication be made as to whether the data are not available distinguished from the situation where the value is zero. SBC will pass a "Null" value through its DataGate, EDI and CORBA interfaces, when information is not available. Providing the "Null" indicator will eliminate programming problems for both SBC and the CLECs[2].

- Location of load coils
- Presence of repeaters
- Location of repeaters
- Type of repeaters
- Quantity of repeaters
- Type of plant (aerial or buried)
- Type of loop (copper or fiber)

- Availability of spare facilities
- Location of bridged tap
- Quantity of bridged tap by occurrence
- Location of bridged tap by occurrence
- Quantity of range extenders
- Location of range extenders

- Location of pair gain devices
- Type of DLC

[redacted]

- Location of DLC
- Quantity of DLC
- Presence of DAML
- Presence of disturbers in same or adjacent binder groups
- Loop medium
- Whether the loop originates at a Remote Switching Unit (RSU)
- Location of Remote Switching Unit (RSU)
- Type of Remote Switching Unit (RSU)
- Resistance zone
- Whether the loop originates at an ADSL Capable Remote Terminal (RT)
- Whether the loop originates at a Non-ADSL Capable Remote Terminal (RT)
- Indicator of whether ADSL capable RT is available
- Target date of when ADSL capable RT will be deployed
- Location of ADSL capable RT by address
- Location of ADSL capable RT by CLLI
- Location of non-ADSL capable RT by address
- Location of non-ADSL capable RT by CLLI
- Wire Center Code
- Taper Code

For designed loop qualification and manual request results responses, SBC will provide by July 22, 2000 both the build date and the date the record was last accessed. However, when loop make-up information is composed of actual data, SBC cannot provide similar date information.

By April 24, 2000, SBC will make available sample data for 100 addresses in each SBC/Ameritech states so CLECs may review the types of data that will be returned.

To ensure CLECs that SBC's EDI and DataGate pre-order functions have access to and return all information related to loop make-up that is contained in SBC's systems and databases, SBC will allow CLECs to review/audit SBC's systems and processes to establish the fact that SBC has made all data fully available. The process for such a review and audit will be determined by May 1, 2000 and will include parameters for materials necessary for the review/audit, frequency and scope of the review/audit, selection of representatives of the CLECs' choice, as well as format and distribution of the review/audit results..

**SBC is committed to populating existing databases in all operating regions on a going forward basis as individual manual requests for loop qualification information are received and

performed by SBC engineers. [please note that the CLECs and SBC could not agree to an acceptable timeframe for population of the data] (ASI does not concur on issue). Further, SBC will launch an effort to populate loop make-up data in mechanized systems where it does not exist so that the percent of actual data becomes consistent with the level of actual data in the Ameritech region. This project will begin in July 2000 but, because of the massive amount of data to be converted, could take 4-6 years to complete. SBC will solicit feedback from CLECs on the priority of offices for which data will be populated and make every attempt to mechanize the data for those offices based on the CLEC priorities identified. SBC will report on a quarterly basis, via Accessible Letter, offices completed in the previous quarter and offices scheduled for the next quarter.

SBC will enhance Ameritech's TCNet GUI application by September 1, 2000 to include all Loop Qualification (LQ) functionality that will be made available via Ameritech's EDI interface for LQ on April 3, 2000. The LQ functionality being proposed for TCNet will be comparable to what SWBT/PB/NB will be providing on April 29, 2000.

SBC commits that access to data through EDI and DataGate pre-ordering functionality will include all data that resides in SBC's systems. Further, SBC commits that as its manual records are mechanized, these EDI and DataGate pre-order functionalities will also be updated to access the new electronic records.

D. Ordering

[insert at the third paragraph]
Currently, there are some differences pertaining to the types and technical specifications of xDSL/Line Sharing Capable loops offered. Rather than having standards based on technology, which are by their very nature limiting, the industry is currently moving toward spectrum management classes that are not based on specific technologies. SBC's regions will standardize its xDSL/Line Sharing Capable loop product offerings based on the industry's proposed broad-spectrum management classes.

[insert as the fifth paragraph]
SBC will enhance its Verigate, DataGate and EDI interfaces to add a new, optional field in which a CLEC may place a Reference Number with a Loop Qualification (LQ) request by the planned July 22, 2000 release. This field can be used with the Actual/Detail and Manual LQ Inquiries as an optional field. It will be provided back on the Actual/Detail/Manual Request and Manual Results LQ Responses. This field will be returned on responses for the CLEC to use in tracking the inquiry. The Reference Number Field will be a 16-character alpha/numeric field. Address will continue to be the means to search for Loop Qualification results. SBC will consider additional capabilities within the Change Management Process. CLECs will be allowed to utilize the CNO field of the LSR as an optional field for their own reference number. In no circumstance shall the lack of a reference number in the CNO field affect the timely flow through processing of a Local Service Request. There will be no edits on this field.

[insert at the end of the sixth paragraph]

Further SBC commits to assess the development of a SPEC code, which would allow CLECs to preauthorize necessary conditioning. This would be in the form of a xDSL/Line Sharing Capable loop product enhancement and a decision will be made not later than May 1st, 2000.

The CLEC will not incur a charge for the removal of low pass filters on SBC's side of the demarcation point.

For xDSL/Line Sharing Capable unbundled loops with a length of 12,000 feet or less, SBC will remove load coils, repeaters, and excessive bridged tap, if present on the assigned loop, without requiring the CLEC to specify that conditioning is desired. The conditioning will be performed at no additional charge in accordance with the language contained in the merger conditions paragraph 21 at p. 31 which says "...unbundled loops of less than 12,000 feet (based upon theoretical loop length) that could be conditioned to meet the minimum requirements defined in the associated SBC/Ameritech technical publication through the removal of load coils, bridged tap, and/or voice grade repeaters will be conditioned at no charge to the requesting Advanced Services Provider..."

[insert at the end of the ninth paragraph]
The typical interval for installation of 1 to 20 loops of less than 12,000 feet where no conditioning is required is 5 business days, and no longer than 10 business days where conditioning is required. Thus, the typical overall maximum interval for the processing of an error free order should be no longer than 15 business days. The previous description of intervals is for illustrative purposes only.

[insert after the tenth paragraph]
After the SBC service order has been issued and the loop has been assigned, SBC will then provide loop make up information for the actual assigned loop to the CLEC via a DLR or DLR-like document. In regions where an industry standard DLR is unavailable, SBC will provide a DLR like response containing all information in an industry-standard DLR for loops used to provide Advanced Services. This industry standard DLR or DLR-like response will be continuously updated as inside/outside plant information is modified through the life of the circuit as information on the DLR or DLR-like response might be changed.

G. Timeline

[insert as second paragraph]
In order to deliver this capability to the CLEC community in an expedited fashion, SBC will initially provide access to loop qualification information based on a designed model. This will first eliminate the manual step described in the PMOs and then the process will be enhanced to access actual loop data. This mechanized access to loop qualification information (based on the designed model) will initially be available, in the PB/NB and SWBT regions, via DataGate. The DataGate enhancement to support loop qualification was implemented March 18, 2000.

This same capability will also be made available via EDI. The EDI enhancement is planned for April 29, 2000. This EDI functionality will be made available in the existing EDI pre-ordering interfaces in the SWBT and PB/NB regions. Comparable changes will also be made in the

SNET EDI interface. These changes will be introduced in SNET via the July 22, 2000 release even though the SBC/Ameritech Merger Conditions allow for the SNET changes to be implemented on a later timeline.

Use of loop information based on a designed model is not being utilized in Ameritech. The EDI pre-ordering interface within the Ameritech region will be enhanced to provide loop qualification based on actual loop data without making the interim change described for the other regions. This interface enhancement will be made available in the Ameritech region on April 3, 2000 per specifications provided via TCNet on January 27, 2000. The additional loop make-up data elements identified in the Plan will be added to this interface by May 17, 2000. The ability to use actual loop data, where available, via both DataGate (where currently deployed) and EDI interfaces, is planned for April 29, 2000 in the SWBT and PB/NB regions and for July 22, 2000 in the SNET region.

Although the actual changes to the EDI ordering interfaces are not complex, these changes will take time to introduce within SBC in order to be ready to allow CLECs to benefit from the improved ordering process. Therefore the EDI ordering changes will be introduced in the Ameritech, PB/NB and SWBT regions no later than December 2, 2000. These same process changes will be made in SNET within the obligatory timeframe. However the exact date has yet to be determined. The Uniform Interfaces Plan of Record will identify the release date when these process changes will take effect in SNET.

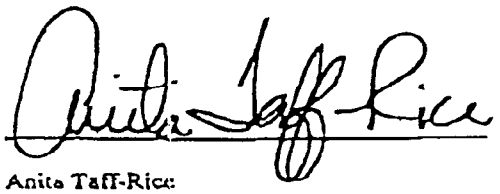
SBC FMO Timeline -- Release Schedule

Milestones	Availability Date
Loop Qualification	
Access to the loop qualification information based on a designed model	
DataGate (SWBT/PB/NB)	
• Initial Specifications Accessible Letter	12/17/1999
• Final Specifications Accessible Letter	1/14/2000
• CLEC Testing Start Date	2/9/2000
• Implementation	3/18/2000
Loop Qualification	
Access to actual loop qualification information where mechanized data is available. Loop qualification information based on a designed model will be supplied where actual loop qualification information is not available	
EDI (Ameritech)	
• Pre-Notification of Change	12/16/1999
• Final Specifications available via TCNET	1/27/2000
• Implementation	4/3/2000
DataGate (SWBT/PB/NB)	
• Implementation (UNE Remand)	4/29/2000
EDI (SWBT/PB/NB)	
• Implementation (UNE Remand)	4/29/2000
EDI (Ameritech)	
• Implementation (UNE Remand)	5/17/2000
EDI (SNET)	
• Implementation (UNE Remand)	7/22/2000
Ordering	
EDI (SWB/PB/NB)	
• CLEC Testing Start Date	4/24/2000
Implementation	5/27/2000
•	
EDI (Ameritech – Line Sharing only)	
• CLEC Testing Start Date	4/24/2000
• Implementation	5/27/2000
EDI (SNET – Line Sharing)	
• Implementation	5/27/2000
EDI (Ameritech – xDSL Ordering Flow Through)	
• Implementation	12/2/2000

The undersigned CLECs, and SBC agree that the changes discussed above represent all of the issues on which agreement was reached during the POR collaborative process specified in Phase II of the Merger Conditions Order. The CLECs note that a number of substantive issues remain unresolved. Those issues are discussed in the Notification to which this document is attached.

Respectfully submitted

On Behalf of CLECs



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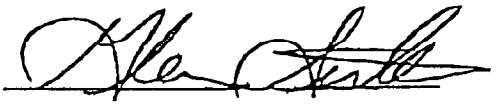

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